

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF GEORGIA - MACON DIVISION**

CHASITY JENKINS,

plaintiff,

—v—

LAZEGA & JOHANSON LLC,

defendant.

Civil Action File Number

5:17-cv-00064-MTT

Jury Trial Demanded

JOINT DISCOVERY STATUS REPORT

COME NOW by counsel the parties and, after conferring by telephone on Thursday, 17 August 2017, and by email before and after, make their *Joint Discovery Status Report* as follows:

1

The Parties Initial Disclosures

The Plaintiff served her initial disclosures on April 7, 2017.

The Defendant serviced its initial disclosures on April 5, 2017.

2

The Plaintiff's Discovery Requests

Plaintiff served her *First Interrogatories to Defendant* and her *First Requests to Defendant for Production of Documents* on April 14, 2017. Defendant formally responded to the Plaintiff's instruments of discovery on May 15, 2017. However, Defendant ha already informally responded by providing computer recording files and documents by email on April 14, 17, and 25, 2017.

3

The Defendant's Discovery Requests

Defendant served a *Notice of Deposition of Plaintiff* on April 25, 2017. The parties by agreement rescheduled the deposition and Defendant completed its deposition of Plaintiff on June 2, 2017.

4

The Parties' Expected Additional Discovery

(a) Plaintiff's Expected Additional Discovery

Possible 3rd party discovery, Rule 30(b)(6) deposition of Defendant, and Requests to Admit to authenticate documents and narrow issues for trial.

(b) Defendant's Expected Additional Discovery

Requests for Production of Documents and Requests to Admit to authenticate documents and narrow issues for trial.

5

Experts

Neither party expects to require the use of expert witnesses.

Respectfully submitted this 17th day of August 2017 by:

Addleton Ltd. Co.

by: s\ David F. Addleton

David F. Addleton
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— AND —

LAZEGA & JOHANSON LLC

by: s/ David B Fife *

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* Signed pursuant to express permission of David B Fife by David F Addleton.

CERTIFICATE OF SERVICE

The undersigned certifies that on the below written he served a copy of the Parties' *Joint Discovery Status Report* by electronically filing the same with the Clerk of the Court using the CM/ECF System that will send notification of such filing to all counsel of record as follows:

David B Fife, Esq

davidf@ljlaw.com

David F Addleton, Esq

dfaddleton@gmail.com

Respectfully submitted this 17th day of August 2017, by:

Addleton Ltd. Co.

by: s/ David F. Addleton

David F. Addleton

Attorney for Plaintiff

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